REMARKS

This paper is responsive to the Office Action dated May 12, 2008 (the "Final Office Action").

Claims 1, 2, 5, 9, 16-19, 22, 26, 33, 34, 38-43, and 45-53 are pending.

Claims 1, 2, 5, 9, 16-19, 22, 26, 33, 34, 38-43, and 45-53 stand rejected.

Claims 1, 2, 5, 9, 16-19, 22, 26, 33, 34, 38-43, and 45-53 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,442,516 issued to Lee et al. ("Lee") in view of U.S. Patent No. 6,425,123 issued to Rojas et al. ("Rojas"), and further in view of U.S. Patent No. 5,416,903 issued to Malcolm ("Malcolm").

Applicant respectfully submits that the claims are patentable and respectfully requests reconsideration of the pending rejections and objections in view of the amendments and remarks presented herein.

Claim rejections under 35 U.S.C. § 103(a)

Claims 1, 2, 5, 9, 16-19, 22, 26, 33, 34, 38-43, and 45-53 stand rejected under § 103(a) as being unpatentable over Lee in view of Rojas and further in view of Malcolm. While not conceding that the cited references qualify as prior art, but instead to expedite prosecution, Applicant has chosen respectfully to address the rejections as follows. Applicant reserves the right, for example in a continuing application, to establish that the cited reference does not qualify as prior art as to an invention embodiment previously, currently, or subsequently claimed.

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Applicant gratefully acknowledges the Examiner's comments, on pp. 5 and 6 of the Final Office Action, regarding claim limitations added in Applicant's previous response, dated February 19, 2008. However, Applicant believes that the Final Office Action does not fully address arguments that Applicant had previously made regarding these and related claim limitations. The arguments in this paper include a discussion that expands on those previous arguments, with specific discussion of the passages from Malcolm that the Examiner has cited in the Final Office Action with regard to these limitations.

Applicant respectfully submits that the claims include limitations that are not disclosed within the cited sections of the references. For example, amended independent claim 1 includes modifying the base version of the application in response to the internationalization and/or the localization of the base version of the application. This modifying provides, in some implementations of the invention, a closed-loop exchange of information between the base version development, internationalization, and localization of a software product, as depicted in FIG. 1 of the present application. This process can be made iterative, as depicted in FIG. 1, and as discussed in the Specification, for example on p. 9.

The cited passages of the references do not teach such features. The cited passages could not and would not be understood by a person having ordinary skill in the art as teaching such closed iterative processing because they do not disclose the limitation of <u>modifying of a base version of the application in response to the internationalization or the localization of the base version of the application.</u>

With regard to this limitation, the Final Office Action cites the following passages of Malcolm:

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> As a further aid in the translation process, it has been found to be extremely useful to track and log changes made during the development of the initial panels. Such changes are common in a typical engineering/software development cycle, when a product progresses through various stages prior to the end product. For example, testing may discover errors in the program, the user interface may be objected to by a human-factors specialist, etc. Yet, in order to decrease development time of products (or 'time to market'), numerous activities must be done in parallel to reduce the overall time requirements. Therefore, a set of screen panels for a given application may need to be sent to a translation center before the final program code is completed.

Malcolm at 10:16-29.

The Final Office Action appears to equate Malcolm's program code development with Applicant's modifying of a base version of an application, and appears to equate Malcolm's translation operations with Applicant's internationalization or localization. Even if these characterizations are correct (a point which Applicant does not concede), the cited passages nonetheless fails to disclose each limitation of Applicant's claim 1 because they fail to teach that a base version of the application is modified <u>in response to</u> the internationalization or localization.

The cited passage, quoted above, describes the value of tracking and logging changes in the "initial panels" that are to undergo translation in Malcolm. The cited passage teaches that various activities can be done in parallel, such as the translation of initial drafts of the panels. This parallel division of labor is intended to decrease the development time of products. "Therefore, a set of screen panels for a given application may need to be sent to a translation center before the final program code is completed." *Id*. at 10:27-29.

Malcolm notes, however, that some of the early translation of the initial panels may need to be redone if the initial panels are subsequently revised or otherwise changed after the

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translators have already stared converting the initial drafts into other languages. "Such changes

are common in a typical engineering/software development cycle, when a product progresses

through various stages prior to the end product. For example, testing may discover errors in the

program, the user interface may be objected to by a human-factors specialist, etc." *Id.* at 10:18-

21.

The resulting revisions to the user interface, and other changes, cause complications for

the translators who are were provided with now-obsolete versions of the initial panels. This

observation is in the same paragraph as the passage cited in the Final Office Action:

> [W]hen the translation centers begin work on a pre-release version
> of code, the potential exists that what is desired in the final product
> may have different screen panels, requiring a different language
> dependent file for translation. There is no convenient method for
> indicating how a subsequent language dependent file differs from
> an earlier received version.

Malcolm at 10:34-56.

The subsequent passages in Malcolm go on to describe how changes that affect

translation can be tracked in a change log file 140. *Id.* at 10:63-68. This change log file 140 is

helpful to the translator centers and translators, who may have already completed the translation

of a previous version of the material. The translators can then expedite their tasks by comparing

the previous and current versions. *Id.* at 10:59-63; 11:26-34.

The cited passages describe the passing of changes from program code to translation

centers. However, the cited passages clearly do not describe any information in the opposite

direction, from the translators to program code development. While changes in the program

code are tracked and provided to Malcolm's language translators, the language translators do not

provide any information in the opposite direction, and they certainly do not provide any information that is then used for revisions in the code development.

In contrast, Applicant's claim 1 includes modifying the base version of the application. The plain language of the claim clearly states that this modifying is performed "in response to at least one of the internationalization or the localization of the base version of the application."

This limitation, in some implementations of the invention, may provide value that is not available to a practitioner of the Malcolm technology, at least because the Malcolm translators do not provide information back to Malcolm's code developers. In contrast, Applicant's Specification clearly notes examples of an iterative process in which "second base stage 22 is initiated, further developing the base version code, and implementing any fixes and/or changes for bugs discovered during the internationalization 14 and localization 16 of the code generated by the first base stage 20." Specification at 9.

At least this limitation is absent from the cited passages of the references. At least for this reason, amended independent claim 1 and all claims dependent therefrom are allowable under § 103(a). At least for similar reasons, amended independent claims 18 and 34 and all claims dependent therefrom are also allowable under § 103(a).

Claim 45 is additionally allowable over the cited passages.

In addition, Applicant's dependent claims 45 is additionally allowable over the cited passages. Applicant acknowledges the arguments presented on pp. 1, 3, and 10 of the Final Office Action with regard to this claim. The Final Office Action points to teachings "that allows the development team to perform concurrent builds on all the NLS build releases at any time during the development cycle" (Lee at 3:59-61), and that "numerous activities must be done in

parallel to reduce the overall time requirements" (Malcolm at 10:25-27). These passages teach that different "builds" can be performed concurrently, and that these builds can be performed in parallel with some other operations.

The Final Office Action appears to equate Malcolm's "builds" with Applicant's internationalization. Even if this characterization is correct (a point which Applicant does not concede), the cited passages at most teach (1) that different internationalizations can be performed concurrently, and (2) that various activities can be done in parallel.

These passages do not, however, indicate a concurrent combination of an internationalization with a localization. These passages, whether taken separately or in combination, fail to hint, suggest, or teach that it would be helpful to perform an internationalization concurrently with a localization. Moreover, these passages fail to teach that the internationalization is an internationalization of the second stage of a base version of an application, while the localization is a localization of the first stage.

At least these additional limitations are therefore also absent from the cited passages, rendering dependent claim 45 additionally allowable under § 103(a). Dependent claims 48 and 51 are similarly additionally allowable under § 103(a).

CONCLUSION

In view of the remarks set forth herein, the application and the claims therein are believed to be in condition for allowance and a notice to that effect is solicited. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, the Examiner is invited to telephone the undersigned at 512-439-5093.

If any extensions of time under 37 C.F.R. § 1.136(a) are required in order for this submission to be considered timely, Applicant hereby petitions for such extensions. The undersigned also hereby authorizes that any fees due for such extensions or any other fee associated with this submission be charged to deposit account 502306.

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